



Indoctrinating Subcontractors into the DOE Safety Culture and Expectations

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Daryl Schilperoort, Personal Bio.

- Daryl Schilperoort earned his Bachelor of Science degree in Business Administration. He currently holds certifications as a Safety Trained Supervisor and Project Management Professional.
- Daryl has worked on the US DOE Hanford Site for over 25 years and has served as a Reactor Operator, Senior Reactor Operator and N Reactor Shift Operations Manager.
- He has worked supervising subcontractors for the last 12 years and oversaw the subcontracted work that built the Interim Safe Storage Enclosures on four Hanford reactors.
- As the WCH Subcontract Technical Representative Program Manager he is responsible for the training and qualification of WCH Construction Subcontract Technical Representatives and also provides construction subcontract perspective and expertise to WCH organizations.

Why Indoctrinate Subcontractors?

- WCH is limited to doing no more than 40% self performance of RCCC value (large business limitation).
- Many of WCH subcontracts target small businesses with limited experience in the DOE safety culture.
- Safety Performance is factored into the incentive fee structure of the RCCC
- Therefore, Subcontractors have a significant impact on successfully and safely performing work.
- So...some might say, lets just add the OSHA and DOE Order requirements to the subcontracts, Like....

1910.26 Portable Metal Ladders



OSHA 1926.501 Duty to Have Fall Protection



1910.28 Safety Requirements for Scaffolding



1926.651 Specific Excavation Requirements



1926.753 Hoisting and Rigging



Selecting Subcontractors for Safety Success

- Pre-qualification Requirement – Experience Modified Rate (EMR) of 0.9 or less
- Exhibit G, Safety Requirements
 - Tailoring process identifies only specific requirements to flow down to the subcontractor (S/C)
- 10 CFR 851 Implementation Matrix
 - WCH provides guidance to complete the matrix
 - 851 Matrix is a required submittal for WCH review and approval to document S/C has policies and procedures

Subcontractor Safety Personnel Qualifications

- Subcontractor must be supported by Certified Industrial Hygienist (CIH) or Certified Safety Professional (CSP)
- Personnel working on project must have or be working toward:
 - Construction Health Safety Technician (CHST),
 - Occupational Health and Safety Technician (OHST),
 - Associated Safety Professional (ASP),
 - Industrial Hygienist in Training (IHIT) or Certified Associate Industrial Hygienist (CAIH),
 - Actively pursuing a CIH/CSP designation,
 - Equivalency in experience with approval from the STR/Project Safety Representative.

Subcontract Work Planning and Control

- Integrated Work Control Procedure (IWCP)
 - Identifies and defines work scope with disciplined change process
 - Craft participate in identifying hazards and developing controls through Job Hazard Analysis process involving a job site walkdown
 - IWCP roles may be assigned to either Subcontractor or WCH personnel with appropriate training
 - Responsible Manager, Planner, Work Supervisor

Subcontractor Readiness to Begin Work

- Project Specific Requirements
 - Participate in Project Startup Reviews
 - Site & Facility Preparations
 - Equipment & Materials
 - Personnel
 - Documents
 - Safety Basis
 - Perform Mockup and Dry runs

Maintaining Subcontractor Safety Focus

- Weekly Safety Meetings, topics developed by WCH and the subcontractor
- Safety campaign involvement and awards
 - Safety Ownership Program (Con Ops Focus)
 - Safe Work Hours Milestones
 - Your Fingers are Nothing to Gamble
- Safety Bulletins
- Weekly Safety Roundup

Minimize Subcontractor Employee Differences

- S/C Craft are treated similar to WCH Craft in regards to safety recognitions and awards
- S/C Employees invited to attend RCCC all employee meetings
- S/C and WCH management, Supervisors and Safety Personnel attend periodic Safety Forum Meetings
- STS Certification
 - WCH funded for Subcontractor Employees

Subcontractor Employee Safety Involvement

- Local Safety Improvement Teams (LSIT)
 - Subcontractor craft attend Monthly LSIT meetings
 - One representative from each craft
 - Management support is critical
 - LSIT maintains Safety Log Book
 - Craft encouraged to document safety items
 - Craft works with Management to close items
 - LSIT Chairs attend Monthly meeting
 - Share issues and information
 - Increasing number of Building Trades Craft are LSIT Chairs

Subcontractor Employee Safety Involvement

- VPP Participation
 - Subcontractor craft involved in VPP interviews
 - Building Trade Craft safety culture contributed to VPP Star
- Task Safety Awareness (TSA) Cards
 - Craft facilitated safety process
 - Management support is critical

WCH Subcontract Safety Incentive

- Up to \$400 per eligible employee paid quarterly
- Based on Quantifiable accident criteria
- Failure to report accidents or intentional alteration of an accident scene results in 100% loss of incentive fee
- Expectation is that 90% goes to employees in an equally distributed cash payout.
- Safety incentive payments create greater interest by craft in behavior of co-workers and their safety

Subcontractor Oversight by WCH

- WCH personnel are safety certified (STS, ASP, CHST, etc.)
- Each subcontract has a designated WCH safety professional
- Subcontractor negative performance trends are identified and responded to early
- Continued negative performance results in:
 - reduction of potential safety incentive payment,
 - additional WCH oversight presence and
 - negative performance review with
 - possible inability to bid on future work

Subcontractor Safety Culture Challenges

- Successful subcontractors assign craft with DOE work experience to monitor and mentor new craft
- Without a nucleus of DOE Safety Culture experienced workers extra oversight and mentoring is required
 - Key element is ensuring building trades supervisors and superintendents have bought into the DOE safety culture reality and consistently communicate the expectations to their craft.
- Questions?